

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

WILUS INSTITUTE OF STANDARDS  
AND TECHNOLOGY INC.,

*Plaintiff,*

v.

HP INC., et al.,

*Defendants.*

Civil Action No. 2:24-cv-0752-JRG-RSP

**LEAD CASE**

**JURY DEMANDED**

**JOINT MOTION FOR EXTENSION OF TIME TO FILE PROPOSED  
PROTECTIVE ORDER AND TO SERVE INITIAL AND ADDITIONAL DISCLOSURES**

Plaintiff, Wilus Institute of Standards and Technology, Inc. (“Wilus”) and Defendants HP Inc., Samsung Electronics Co. Ltd., Samsung Electronics America, Inc., Askey Computer Corp, and Askey International Corp. (collectively, “Defendants”) (collectively with Wilus, the “Parties”) file this Joint Motion for Extension of Time to File Proposed Protective Order and serve Initial and Additional Disclosures.

The current deadline for the Parties to file their proposed protective order and to comply with Paragraphs 1 & 3 of the Discovery Order (Initial and Additional Disclosures) is December 20, 2024. The Parties respectfully request a brief extension of time to reach compromise on several remaining disputes to avoid filing a disputed Protective Order. The Parties have been diligently working to prepare these materials and respectfully request a brief extension of time in order to finalize these materials. This brief extension will give the Parties adequate time to continue meeting and conferring to narrow their disputes. This extension is not sought for prejudice or delay, but for good cause and so that justice may be served.

Accordingly, the Parties respectfully request that the Court extend the deadline for filing their proposed protective order and to comply with Paragraphs 1 & 3 of the Discovery Order

(Initial and Additional Disclosures) ten (10) days to December 30, 2024.

Dated: December 20, 2024

Respectfully submitted,

/s/ Jonathan Ma

Reza Mirzaie

rmirzaie@raklaw.com

CA State Bar No. 246953

Marc A. Fenster

mfenster@raklaw.com

CA State Bar No. 181067

Neil A. Rubin

nrubin@raklaw.com

CA State Bar No. 250761

Christian W. Conkle

cconkle@raklaw.com

CA State Bar No. 306374

Jonathan Ma

jma@raklaw.com

CA State Bar No. 312773

**RUSS AUGUST & KABAT**

12424 Wilshire Boulevard, 12th Floor

Los Angeles, CA 90025

310-826-7474

**ATTORNEYS FOR PLAINTIFF,  
WILUS INSTITUTE OF STANDARDS  
AND TECHNOLOGY**

/s/ Lawrence R. Jarvis

Benjamin C. Elacqua

Texas Bar Number 24055443

elacqua@fr.com

909 Fannin Street, Suite 2100

Houston, TX 77010

Telephone: (713) 654-5300

Lawrence R. Jarvis

GA Bar No. 102116

jarvis@fr.com

**Fish & Richardson P.C.**

1180 Peachtree St. NE, Fl. 21

Atlanta, GA 30309

Telephone: (404) 892-5005

Facsimile: (404) 892-5002

Melissa R. Smith  
Texas Bar No. 24001351  
**GILLAM & SMITH, LLP**  
303 South Washington Avenue Marshall,  
Texas 75670  
Telephone: (903) 934-8450  
Facsimile: (903) 934-9257  
Email: melissa@gillamsmithlaw.com  
*Attorneys for HP Inc.*

/s/ Trey Yarbrough  
Trey Yarbrough  
trey@yw-lawfirm.com  
**YARBROUGH WILCOX, PLLC**  
100 E. Ferguson Street, Suite 1015  
Tyler, TX 75702  
903-595-3111  
*Attorneys for Askey Computer Corp. and  
Askey International Corp.*

/s/ Melissa Smith  
Melissa Smith  
Melissa@gillamsmithlaw.com  
**Gillam & Smith LLP**  
303 S. Washington Avenue  
Marshall, TX 75670  
903-934-8450  
*Attorneys for Samsung Electronics Co. Ltd.  
and Samsung Electronics America, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 20<sup>th</sup> day of December, 2024, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3). Any other counsel of record will be served by electronic mail on this same date.

/s/ Lawrence R. Jarvis  
Lawrence R. Jarvis

**CERTIFICATE OF CONFERENCE**

The undersigned certifies that counsel complied with the requirements of Eastern District of Texas Local Rule CV-7(h). The parties are in agreement on filing this Joint Motion.

/s/ Lawrence Jarvis  
Lawrence Jarvis